Unitil
Unitil Service Corp.

August 4, 2005

VIA OVERNIGHT MAIL

Ms. Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd floor
Boston, MA 02110

Re: Investigation by the Department Regarding Service Quality Guidelines Established in Service Quality Standards for Electric Distribution Companies and Local Gas Distribution Companies, D.T.E. 04-116

Dear Secretary Cottrell:

Enclosed for filing on behalf of Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil"), please find an original and one (1) copy of Unitil's responses to the Department's fifth set of information requests to all Electric Local Distribution Companies in the above-referenced docket. As requested, copies of Unitil's responses are being sent by e-mail to the parties.

Thank you for your attention to this matter.

Sincerely,

Gary Epler

Enclosure

cc: Jody M. Stiefel, Hearing Officer

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Commonwealth of Massachusetts
Department of Telecommunications and Energy
Investigation Into Service Quality Guidelines
Docket No: D.T.E. 04-116
Department Staff's Fifth Set of Information Requests to
All Electric Local Distribution Companies

Request No. DTE-LDC 5-1

Please refer to the alternative formula below for the Problem Circuit Remediation Index ("PCRI").

(8760-Circuit SAIDI)/8760

Comment on the advantages and disadvantages of employing this formula over the previous formula as expressed in Attachment A of DTE-LDC 4-1 through DTE-LDC 4-6.

Response:

Unitil described the advantages and disadvantages of reporting reliability indices on a circuit level basis in response DTE-LDC 3-3 and DTE-LDC 4-2. Unitil responded to the previous version of the PCRI index in response DTE-LDC 4-4. Unitil does not believe reporting reliability indices on a circuit level basis will provide clear and concise information that can be used without a high level of system knowledge. Unitil does and will continue to use this type of information as an analytical tool for developing the cost effective reliability improvement projects focused on reducing response time (CAIDI) and eliminating interruptions (SAIFI).

The formula as presented is circuit level equivalent to ASAI (Average Service Availability Index). This reports the percentage of time the system (or circuit) provided service to the average customer.

Unitil does not believe that ASAI is a useful indicator for reliability performance. For instance, if reliability performance is reported in ASAI = 99.97%, that is not useful until it is translated into its SAIDI component of 2 hours. Using ASAI as a reporting mechanism will only result in an extra calculation to convert SAIDI to ASAI and vice versa. ASAI does not provide any further information than SAIDI provides.

Unitil is concerned with any penalty measures that occur from reporting reliability indices on a circuit level basis. As stated in other responses, reviewing reliability performance on a circuit level basis is a good analytical tool that can be used by utilities, in conjunction with other system knowledge, to develop cost effective system reliability improvement projects. However, the variability from year to year (i.e., weather, circuit configuration, trimming cycle, etc.) can have a major impact on the results. Utilities need to have the flexibility to implement reliability improvement projects that provide the best cost to benefit ratio.

For the variety of reasons stated above and in responses DTE-LDC 3-3, DTE-LDC 4-2 and DTE-LDC 4-4, Unitil's opinion is that the proposed PCRI index approach will not necessarily improve the performance of problem circuits.

Person Responsible: Kevin Sprague **Date:** August 4, 2005